



California Fair Political Practices Commission

August 12, 1988

Gretchen D. Franz
76-757 California Drive
Palm Desert, CA 92260

Re: Your Request for Advice
Our File No. A-88-302

Dear Ms. Franz:

You have requested advice concerning your campaign disclosure obligations under the provisions of the Political Reform Act (the "Act").^{1/}

QUESTION

What are the campaign disclosure requirements for a county central committee member who does not have a controlled committee but who makes contributions from personal funds to other California state and local government candidates?

CONCLUSION

County central committee members must file semiannual campaign disclosure statements during any six-month period in which they make or receive any contribution or make any expenditure.

FACTS

You are an elected member of the Riverside County Republican Central Committee. You do not raise or spend any money on behalf of your own candidacy. During the first six-months of 1988, you made contributions from personal funds of less than \$1,000 to California state and local candidates and officeholders.

^{1/}Government Code Sections 81000-91015. All statutory references are to the Government Code unless otherwise indicated. Commission regulations appear at 2 California Code of Regulations Section 18000, et seq. All references to regulations are to Title 2, Division 6 of the California Code of Regulations.

ANALYSIS

Elected officers and candidates are required to file semiannual campaign disclosure statements. (Section 84200(a).) Members of county central committees are elected officers under the Act and must file semiannual campaign disclosure statements during any six-month period in which they make or receive any contribution or make any expenditure.^{2/} (Section 82023, 84200(a)(2).)

When you make or receive contributions totaling less than \$1,000 during the first six months of the year, and you do not expect to exceed the \$1,000 limit during the entire calendar year, you may file a Form 470 on or before the due date for the first semiannual statement due for that year (August 1 for 1988). A properly completed Form 470 would fulfill your filing obligation for the entire calendar year unless you exceed the \$1,000 limit noted above. If your reportable contributions total more than \$1,000 in a calendar year, you will be required to use Form 490.

In your letter, you list contributions which you made during the first six-month period of 1988. Some of the contributions were made to officeholders or candidates for federal office. However, only those contributions you listed which were made to candidates for or incumbents of California state or local government office or to committees which are active at the state or local level are reportable under the Act.

Enclosed are Forms 470 and 490. You may use whichever form is appropriate for your circumstances. You should file an original and one copy with your county clerk. Because the deadline for filing your campaign statement was August 1, you may want to request a waiver of the fine for late filing.

If you have further questions, please contact me at (916) 322-5662.

Sincerely,

Diane M. Griffiths
General Counsel

Bruce W. Robeck

By: Bruce W. Robeck
Political Reform Consultant

^{2/}This analysis assumes that you do not receive a salary of \$100 or more per month as compensation for your elective office. If this assumption is incorrect, please contact me for clarification of your filing requirements.

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July 22, 1988

Fair Political Practices Commission
428 "J" Street
Sacramento, CA 95814

Gentlemen:

After reading, and rereading several times, the campaign material sent to me by the Riverside County Elections Department (all 140 pages), neither my husband nor I have been able to figure out where or not I am supposed to fill out a campaign disclosure statement. And, if I am, where is the proper form?

I am a member, elected, of the Riverside County Republican Central Committee. Have never spent or collected any money on behalf of my campaign. However, I have contributed to other campaigns or committees in excess of \$1,000.

For this reason, attached is a list of my contributions.

Sincerely,

Gretchen D. Franz

Gretchen D. Franz
76-757 California Drive
Palm Desert, CA 92260
Riverside County
4th Supervisorial District

July 22, 1988

GRETCHEN D. FRANZ

RIVERSIDE COUNTY REPUBLICAN
CENTRAL COMMITTEE 4TH DISTRICT

76-757 California Drive, Palm Desert, CA 92260
(619) 345-3561

Retired

2/27/88	Committee to elect Myron Cole Rancho Mirage City Council	\$100.00
3/16/88	George Bush campaign	250.00
3/24/88	Bill Bradley 76 Club, State Assembly	100.00
4/25/88	Re-elect Al McCandless for Congress	250.00
5/27/88	California Republican Party Reception in Riverside	<u>150.00</u>
		\$850.00
Total amount of contributions under \$100		<u>\$474.00</u>
		\$1,324.00

Gretchen D. Franz